

Jeffrey N. Pomerantz, Esq.
Andrew W. Caine, Esq.
(admitted pro hac vice)
PACHULSKI STANG ZIEHL & JONES LLP
10100 Santa Monica Boulevard
Los Angeles, California 90067-4100
Telephone: (310) 277-6910
Telecopy: (310) 201-0760

Lynn L. Tavenner, Esq. (VA Bar No. 30083)
Paula S. Beran, Esq. (VA Bar No. 34679)
TAVENNER & BERAN, PLC
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219
Telephone: (804) 783-8300
Telecopy: (804) 783-0178

- and -

Robert J. Feinstein, Esq.
(admitted pro hac vice)
PACHULSKI STANG ZIEHL & JONES LLP
780 Third Avenue, 36th Floor
New York, New York 10017
Telephone: (212) 561-7700
Telecopy: (212) 561-7777

*Counsel for the Circuit City Stores, Inc.
Liquidating Trust*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:	:	Chapter 11
	:	
CIRCUIT CITY STORES, INC., <u>et al.</u> , ¹	:	Case No. 08-35653-KRH
	:	
Debtors.	:	(Jointly Administered)
	:	
	:	

**NOTICE OF AMENDED AGENDA OF MATTERS SCHEDULED FOR
HEARING ON AUGUST 21, 2014 AT 10:00 A.M. (EASTERN)**

Set forth below are the matters scheduled to be heard before The Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in the United States Bankruptcy Court for the

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are as follows: Circuit City Stores, Inc. (3875), Circuit City Stores West Coast, Inc. (0785), InterTAN, Inc. (0875), Ventoux International, Inc. (1838), Circuit City Purchasing Company, LLC (5170), CC Aviation, LLC (0841), CC Distribution Company of Virginia, Inc. (2821), Circuit City Properties, LLC (3353), Kinzer Technology, LLC (2157), Abbott Advertising Agency, Inc. (4659), Patapsco Designs, Inc. (6796), Sky Venture Corp. (0311), PRAHS, Inc. (n/a), XSSuff, LLC (9263), Mayland MN, LLC (6116), Courchevel, LLC (n/a), Orbyx Electronics, LLC (3360), and Circuit City Stores PR, LLC (5512). The address for Circuit City Stores West Coast, Inc. was 9250 Sheridan Boulevard, Westminster, Colorado 80031. For all other Debtors, the address was 9950 Mayland Drive, Richmond, Virginia 23233 and is currently 200 Westgate Parkway, Suite 100, Richmond, Virginia 23233.

Eastern District of Virginia, U.S. Courthouse, 701 East Broad Street, Room 5000, Richmond, Virginia 23219-1888, on August 21, 2014 beginning at 10:00 a.m. Eastern.

1. *Siegel v. Sony Electronics Inc., A/K/A Sony et al. – Ad. Pro. No. 10-03600-KRH - Motion to Authorize - MOTION TO PERMIT FILING OF REPLY MEMORANDUM IN SUPPORT OF CROSS-MOTION OF PLAINTIFF TRUSTEE ALFRED H. SIEGEL FOR PARTIAL SUMMARY ADJUDICATION WITH RESPECT TO RECOUPMENT* filed by Lynn L. Tavenner of Tavenner & Beran, PLC on behalf of Alfred H. Siegel [Docket No. 182].

Status: Given the nature of the relief sought, the Trust will request that this motion be heard and that the Court grant the requested relief.

2. *Siegel v. Sony Electronics Inc., A/K/A Sony et al. – Ad. Pro. No. 10-03600-KRH- Scheduling Conference.*
3. *Siegel v. Sony Electronics Inc., A/K/A Sony et al. – Ad. Pro. No. 10-03600-KRH - Motion for Summary Judgment (Motion Of Plaintiff Trustee Alfred H. Siegel For Partial Summary Adjudication As To Claims III, V, VI And VII Of The Second Amended Complaint, And Memorandum In Support Thereof)* filed by Lynn L. Tavenner of Tavenner & Beran, PLC on behalf of Alfred H. Siegel. (Attachments: # (1) Declaration of Andrew Caine in Support) [Docket No. 107].

Related
Documents:

- a. Notice of Hearing (Re: related document(s)[107] Motion for Summary Judgment filed by Alfred H. Siegel, [108] Exhibit filed by Alfred H. Siegel) filed by Lynn L. Tavenner of Tavenner & Beran, PLC on behalf of Alfred H. Siegel. Hearing scheduled for 7/30/2014 at 02:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia.
- b. Exhibit (*Declaration of Brandi Fose in Support*) (Re: related document(s)[107] Motion for Summary Judgment filed by Alfred H. Siegel) filed by Lynn L. Tavenner of Tavenner & Beran, PLC on behalf of Alfred H. Siegel. (Attachments: # (1) Exhibit B # (2) Exhibit D # (3) Exhibit E # (4) Exhibit A # (5) Exhibit C)
- c. Hearing continued; Motion and Cross Motion for Summary Judgment to be heard together (Re: related document(s)[107] Motion for Summary Judgment filed by Alfred H. Siegel, [120] Motion for Summary Judgment filed by SONY ELECTRONICS, INC., A/K/A SONY AND CREDIT SUISSE LOAN FUNDING, LLC) Hearing scheduled for 8/21/2014 at 10:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. Appearances: Robert Feinstein for Plaintiff; Eric Seiler for Defendant. (Oliver, Betty)
- d. Statement -*PLAINTIFFS EVIDENTIARY OBJECTIONS TO THE DECLARATION OF EMILY C.L. CHANG SUBMITTED IN SUPPORT OF DEFENDANT SONYS OPPOSITION TO PLAINTIFFS MOTION FOR PARTIAL SUMMARY*

ADJUDICATION (Re: related document(s)[125] Declaration filed by SONY ELECTRONICS, INC., A/K/A SONY AND CREDIT SUISSE LOAN FUNDING, LLC) filed by Lynn L. Tavenner of Tavenner & Beran, PLC on behalf of Alfred H. Siegel.

Objection

Deadlines: July 23, 2014; extended to July 25, 2014

Objections/
Responses

Filed: Opposition Brief : *Sony Electronics Inc.'s Memorandum of Law in Opposition to Plaintiff's Motion for Partial Summary Judgment* (Re: related document(s)[107] Motion for Summary Judgment filed by Alfred H. Siegel) filed by Peter Barrett of Kutak Rock L.L.P. on behalf of SONY ELECTRONICS, INC., A/K/A SONY AND CREDIT SUISSE LOAN FUNDING, LLC. [Docket No. 119](and related exhibits)

Status: The Trust will request that the Court grant the requested relief.

4. *Siegel v. Sony Electronics Inc., A/K/A Sony et al. – Ad. Pro. No. 10-03600-KRH - Motion for Summary Judgment: Sony Electronics Inc.'s Motion for Partial Summary Judgment* filed by Peter Barrett of Kutak Rock L.L.P. on behalf of SONY ELECTRONICS, INC., A/K/A SONY AND CREDIT SUISSE LOAN FUNDING, LLC. (Barrett, Peter)

Related

Documents:

- a. Notice of Motion and Notice of Hearing (Re: related document(s)[120] Motion for Summary Judgment filed by SONY ELECTRONICS, INC., A/K/A SONY AND CREDIT SUISSE LOAN FUNDING, LLC) filed by Peter Barrett of Kutak Rock L.L.P. on behalf of SONY ELECTRONICS, INC., A/K/A SONY AND CREDIT SUISSE LOAN FUNDING, LLC. Hearing scheduled for 8/27/2014 at 02:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Barrett, Peter)
- b. Motion to Reschedule Hearing : *Sony Electronics Inc.'s Motion to Reschedule and Consolidate for Hearing on a Single Date (a) the Trustee's Motion for Partial Summary Judgment and (b) Sony's Motion for Partial Summary Judgment* (Re: related document(s)[107] Motion for Summary Judgment filed by Alfred H. Siegel, [120] Motion for Summary Judgment filed by SONY ELECTRONICS, INC., A/K/A SONY AND CREDIT SUISSE LOAN FUNDING, LLC) filed by Peter Barrett of Kutak Rock L.L.P. on behalf of SONY ELECTRONICS, INC., A/K/A SONY AND CREDIT SUISSE LOAN FUNDING, LLC. (Barrett, Peter)

- c. Notice of Motion (Re: related document(s)[123] Motion to Reschedule Hearing filed by SONY ELECTRONICS, INC., A/K/A SONY AND CREDIT SUISSE LOAN FUNDING, LLC) filed by Peter Barrett of Kutak Rock L.L.P. on behalf of SONY ELECTRONICS, INC., A/K/A SONY AND CREDIT SUISSE LOAN FUNDING, LLC. (Barrett, Peter)
- d. Brief : *Memorandum of Law in Support of Sony Electronics Inc.'s Motion for Partial Summary Judgment* (Re: related document(s)[120] Motion for Summary Judgment filed by SONY ELECTRONICS, INC., A/K/A SONY AND CREDIT SUISSE LOAN FUNDING, LLC) filed by Peter Barrett of Kutak Rock L.L.P. on behalf of SONY ELECTRONICS, INC., A/K/A SONY AND CREDIT SUISSE LOAN FUNDING, LLC. (Barrett, Peter)
- e. Hearing continued; Motion and Cross Motion for Summary Judgment to be heard together (Re: related document(s)[107] Motion for Summary Judgment filed by Alfred H. Siegel, [120] Motion for Summary Judgment filed by SONY ELECTRONICS, INC., A/K/A SONY AND CREDIT SUISSE LOAN FUNDING, LLC) Hearing scheduled for 8/21/2014 at 10:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. Appearances: Robert Feinstein for Plaintiff; Eric Seiler for Defendant. (Oliver, Betty)
- f. Reply Memorandum of Law in Support of Sony Electronics Inc.'s Motion for Partial Summary Judgment (Re: related document(s)120 Motion for Summary Judgment filed by SONY ELECTRONICS, INC., A/K/A SONY AND CREDIT SUISSE LOAN FUNDING, LLC) filed by Peter Barrett of Kutak Rock L.L.P. on behalf of Sony Electronics Inc.(and related documents)

Objection

Deadline: August 8, 2014

Objections/

Responses

Filed:

- a. Objection to (Re: related document(s)[120] Motion for Summary Judgment filed by SONY ELECTRONICS, INC., A/K/A SONY AND CREDIT SUISSE LOAN FUNDING, LLC) filed by Lynn L. Tavenner of Tavenner & Beran, PLC on behalf of Alfred H. Siegel. (Attachments: # (1) Exhibit(s) Fredericks Declaration)
- b. Exhibit - *Fose Declaration* (Re: related document(s)[158] Objection to Motion/Application filed by Alfred H. Siegel) filed by Lynn L. Tavenner of Tavenner & Beran, PLC on behalf of Alfred H. Siegel. (Attachments: # (1) Exhibit E # (2) Exhibit F # (3) Exhibit G # (4) Exhibit H)
- c. Statement -PLAINTIFFS EVIDENTIARY OBJECTIONS TO THE REPLY DECLARATION OF EMILY C.L. CHANG SUBMITTED IN FURTHER SUPPORT OF DEFENDANT SONYS MOTION FOR PARTIAL SUMMARY JUDGMENT (Re: related document(s)[176] Exhibit filed by Sony Electronics Inc.) filed by Lynn L. Tavenner of Tavenner & Beran, PLC on behalf of Alfred H. Siegel

Status: The Trust will request that the Court deny the Motion.

5. *Siegel v. Sony Electronics Inc., A/K/A Sony et al. – Ad. Pro. No. 10-03600-KRH* - Motion for Summary Judgment (*CROSS-MOTION OF PLAINTIFF TRUSTEE ALFRED H. SIEGEL FOR PARTIAL SUMMARY ADJUDICATION THAT, UNDER THE DOCTRINE OF RECOUPMENT, THE TRUST IS ENTITLED TO USE THE CIRCUIT CITY CREDITS AS A DEFENSIVE OFFSET AGAINST SONY'S CLAIMS, AND MEMORANDUM IN SUPPORT THEREOF*) (Re: related document(s)[120] Motion for Summary Judgment filed by SONY ELECTRONICS, INC., A/K/A SONY AND CREDIT SUISSE LOAN FUNDING, LLC) filed by Lynn L. Tavenner of Tavenner & Beran, PLC on behalf of Alfred H. Siegel.

Related
Documents:

- a. Notice of Hearing (Re: related document(s)[156] Motion for Summary Judgment filed by Alfred H. Siegel) filed by Lynn L. Tavenner of Tavenner & Beran, PLC on behalf of Alfred H. Siegel. Hearing scheduled for 8/21/2014 at 10:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia.
- b. Hearing continued; Motion and Cross Motion for Summary Judgment to be heard together (Re: related document(s)[107] Motion for Summary Judgment filed by Alfred H. Siegel, [120] Motion for Summary Judgment filed by SONY ELECTRONICS, INC., A/K/A SONY AND CREDIT SUISSE LOAN FUNDING, LLC) Hearing scheduled for 8/21/2014 at 10:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. Appearances: Robert Feinstein for Plaintiff; Eric Seiler for Defendant. (Oliver, Betty)
- c. Statement -*PLAINTIFFS EVIDENTIARY OBJECTIONS TO THE DECLARATION OF EMILY C.L. CHANG SUBMITTED IN SUPPORT OF DEFENDANT SONY'S OPPOSITION TO PLAINTIFFS CROSS-MOTION FOR PARTIAL SUMMARY JUDGMENT WITH RESPECT TO RECOUPMENT* (Re: related document(s)[162] Exhibit filed by Sony Electronics Inc.) filed by Lynn L. Tavenner of Tavenner & Beran, PLC on behalf of Alfred H. Siegel.
- d. Reply to - *REPLY MEMORANDUM IN SUPPORT OF CROSS-MOTION OF PLAINTIFF TRUSTEE ALFRED H. SIEGEL FOR PARTIAL SUMMARY ADJUDICATION WITH RESPECT TO RECOUPMENT* (Re: related document(s)[156] Motion for Summary Judgment filed by Alfred H. Siegel, [182] Motion to Authorize filed by Alfred H. Siegel) filed by Lynn L. Tavenner of Tavenner & Beran, PLC on behalf of Alfred H. Siegel. [Docket No. 183]

Objection
Deadline: August 18, 2014

Objections/
Responses
Filed: Objection to Memorandum of Law of Sony Electronics Inc. in
Opposition to Plaintiff's Motion for Partial Summary Judgment

With Respect to Recoupment (Re: related document(s)156 Motion
for Summary Judgment filed by Alfred H. Siegel) filed by Peter
Barrett of Kutak Rock L.L.P. on behalf of Sony Electronics Inc..
(and related documents)

Status: The Trust will request that the Court grant the Motion.

Dated: Richmond, Virginia
August 20, 2014

TAVENNER & BERAN, PLC

/s/ Paula S. Beran
Lynn L. Tavenner (VA Bar No. 30083)
Paula S. Beran (VA Bar No. 34679)
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219
(804) 783-8300

- and -

PACHULSKI STANG ZIEHL & JONES LLP
Jeffrey N. Pomerantz, Esq.
Andrew W. Caine, Esq.
10100 Santa Monica Boulevard
Los Angeles, California 90067-4100
(310) 277-6910

- and -

Robert J. Feinstein, Esq.
John A. Morris, Esq.
PACHULSKI STANG ZIEHL & JONES LLP
780 Third Avenue, 36th Floor
New York, New York 10017
(212) 561-7700

*Co-Counsel for the Circuit City Stores, Inc.
Liquidating Trust*